



August 22, 2016

Brent J. Fields  
Secretary, Securities and Exchange Commission  
100 F Street, NE,  
Washington, D.C.  
USA 20549-1090

**Re: File Number S7-10-16 - Request for Extension of Time to Submit Comments in Response to SEC Proposed Rule for Modernization of Property Disclosure Requirements for Mining Registrants**

Dear Mr. Fields:

Amec Foster Wheeler ([www.amecfw.com](http://www.amecfw.com)) designs, delivers and maintains strategic and complex assets for its customers across the global energy and related sectors. Employing around 36,000 people in more than 55 countries the company operates across the oil and gas industry – from production through to refining, processing and distribution of derivative products – and in the mining, clean energy, power generation, pharma, environment and infrastructure markets.

Amec Foster Wheeler is the product of a number of mergers and acquisitions of companies that were established as long ago as 1907 in North America, and 1848 in Britain. The AMEC name was introduced in 1982. The acquisition of Foster Wheeler took place in 2014. The company is a publicly-traded corporation listed on the London Stock Exchange and its American Depositary Shares are traded on the New York Stock Exchange, and is held by a large number of individual private investors.

Amec Foster Wheeler serves many of the world leaders in the mining industry. The company maintains mining offices across Canada, the USA and Australia, as well as in Santiago, Chile; Lima, Peru; Johannesburg, South Africa; and London, England. In more than 80 countries, we have provided a full range of services for mining projects including:

- ▶ supervision of drilling and sampling
- ▶ prospect evaluation
- ▶ reserve/resource assessment/validation
- ▶ metallurgical testwork supervision
- ▶ process evaluation/flowsheet selection
- ▶ mine planning and design
- ▶ feasibility studies
- ▶ risk and operability assessment
- ▶ operations and maintenance consulting.
- ▶ project economics/financial analysis
- ▶ environmental/geotechnical engineering
- ▶ detailed engineering and procurement
- ▶ construction/construction management
- ▶ project management
- ▶ design-build services
- ▶ plant start-up and commissioning
- ▶ operator training

Amec Foster Wheeler is recognized by the mining industry and the international finance community for the production of NI 43-101 Technical Reports, Competent Persons Reports, and other audit/due diligence work. The company has provided services to virtually all of the world's major mine developers and operators, as well as mid-sized mining companies, "juniors", and lending institutions.



We therefore have followed with great interest the Securities and Exchange Commission's proposed rulemaking for the modernization of mining property disclosure requirements in the United States (the SEC Proposed Rules).

Amec Foster Wheeler staff are involved with a large number of mining and exploration companies who report in multiple jurisdictions, and we are frequently involved in preparation of documents that will be subject to the SEC Proposed Rules. Our staff participate on committees that prepare mining disclosure standards and best practice guidelines, and serve on committees that advise securities regulators on mining disclosure standards.

We have an understanding of the practicalities and difficulties in complying with mining disclosure standards in other jurisdictions. Staff have first-hand experience with the diverse nature of the mining industry, including diversity of deposit types, mining methods, business models of companies, and the types of information that investors and financiers can request when making investment decisions in the company, and information that corporate management requires when deciding to advance a project.

We would like to provide feedback to the Commission staff on specific examples where we see difficulty or impracticality of some of the SEC Proposed Rules in certain circumstances, and make suggestions on how those difficulties may be ameliorated, and still achieve the intended regulatory outcomes. We have spent significant time in reviewing the SEC Proposed Rules and have identified a number of areas where multiple interpretations are possible, and where clarity will be required in the SEC Proposed Rules to ensure that the industry make the correct interpretation and response desired by the Commission staff.

In order for us to provide as useful a set of comments as possible, we will require additional time to prepare our response. We respectfully request an extension of 60 days from the current comment deadline of August 26, 2016 or, specifically until October 25, 2016, within which to submit our comments to you.

Yours sincerely,

A black rectangular redaction box covering the signature of Greg Gosson.

Greg Gosson, Technical Director Geology and Compliance

A black rectangular redaction box covering the signature of Stella Searston.

Stella Searston, Principal Geologist